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NEW YORK, NY

June 21, 1996

RECEIVED

JUN 26 1996

FCC MAIL ROOM

William F. Caton, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Notice of Ex Parte Contact by Intermedia  
Communications, Inc. in Docket No. 96-98

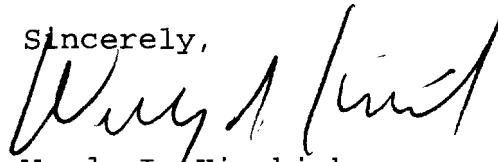
Dear Mr. Caton:

In accordance with §1.1206(a)(2) of the Commission's Rules, I am filing this letter as notice that on June 20, 1996, myself, Jonathan E. Canis of this firm, Michael A. Viren, Senior Vice President, Engineering & Information, at Intermedia Communication's Inc. (ICI), and Julia O. Strow, Director of Regulatory Policy and Strategic Relationships at ICI, met with the following persons at the Commission: Stuart Kupinsky, Paul Gallant, Kalpak Gude, Robert Tanner, and Richard Lerner.

In the meeting, ICI discussed its views regarding interconnection, unbundled network elements, collocation, the tariffing of interconnection arrangements, and the need for national rules. The handouts distributed by ICI at the meeting, are attached hereto.

If you have any questions or need additional information, please call me at 414-9218.

Sincerely,

  
Wendy I. Kirchick

cc: Regina Keeney  
Richard Welch  
James Schlichtling  
Stuart Kupinsky

Paul Gallant  
Kalpak Gude  
Robert Tanner  
Richard Lerner

Wendy I. Kirchick  
1996-06-21

0

INTERMEDIA COMMUNICATIONS, INC.  
FCC EXPARTE REGARDING  
IMPLEMENTATION OF LOCAL COMPETITION PROVISIONS  
IN THE TELECOMMUNICATIONS ACT OF 1996  
DOCKET 96-98

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- NATIONAL RULES/GUIDELINES ARE NEEDED TO FACILITATE THE NEGOTIATIONS PROCESS AND LOCAL COMPETITION.
- UNBUNDLED NETWORK ELEMENTS ARE CRITICAL TO FACILITIES-BASED COMPETITION IN THE LOCAL EXCHANGE MARKET.
  - FCC LINE SIDE LOOP UNBUNDLING RULES MUST SUPPORT A MULTI-HOST ENVIRONMENT.
  - FCC RULES MUST SUPPORT INSIDE WIRE UNBUNDLING VIA A BONA FIDE REQUEST PROCESS IN CASES WHERE THE WIRING IS DEFINED AS AN EXTENSION OF THE INCUMBENT LEC NETWORK.
- COLLOCATION MUST BE PROVIDED AT ANY TECHNICALLY FEASIBLE POINT UNDER THE PROVISIONS OF THE ACT.
  - FCC RULES SHOULD NOT LIMIT THE TYPES OF EQUIPMENT THAT CAN BE COLLOCATED.
  - FCC RULES MUST PERMIT ALEC TO ALEC CROSSCONNECTION.
- ALL INTERCONNECTION ARRANGEMENTS MUST BE TARIFFED BY INCUMBENT LECS TO PERMIT NOTICE TO OTHER LECS OF ALL AGREEMENTS REACHED.

JUNE 20, 1996

New York Telephone Company

Section 7  
6th Revised Page 20  
Superseding 5th Revised Page 20

MILEAGE

D. MILEAGE ON LINES BETWEEN LOCATIONS (Cont'd)

2 6115

2. Definition of Mileage Components

★ [ Intrabuilding Channel Charge: Denotes the charge associated with house cable used to provide channels between different floors in the same building. The demarcation point on each floor will be located not more than 10 feet within the customer's premises.

[ Central Office Loop Charge: Denotes the charge associated with that segment of a line which extends from the interface point on the subscriber's premises to the normal central office.

Issued July 17, 1989

Effective October 6, 1989

By Cornelia McDougald, General Attorney  
1095 Avenue of the Americas New York, N.Y. 10036

New York Telephone Company

Section 7  
24th Revised Page 22  
Superseding 20th and 22nd Revised Pages 22  
(23rd Revised Page 22 Pending)

MILEAGED. MILEAGE ON LINES BETWEEN LOCATIONS (Cont)3. Rates and Charges for Mileage Components

The application of these rates is shown in D.4. following for other than intercept lines.

		<u>Monthly Rates</u>		<u>USOC</u>	
		<u>Signal Grade*</u>	<u>Other</u>		
a.	Continuous Property Loop	See Rate Schedule attached for rates and charges currently in effect.			
	Per 2-Wire Loop				
	Per 4-Wire Loop				
	Block Loop**				
	Per 2-Wire Loop	\$21.77	\$27.73	BKP2x (T)	
	Per 4-Wire Loop	43.54	55.46	BKP4x (T)	
	Central Office Loop** #				
	Per 2-Wire Loop	21.53	21.53	CON2x	
	Per 4-Wire Loop	40.61	40.61	CON4x	

Monthly Rate

★ [	b.	Intrabuilding Channel Charge, )	See Rate Schedule attached for rates and charges currently in effect.	
		Per 2-Wire Termination )		
		Per 4-Wire Termination )		
		Installations Charge, )	see Para. e. Following)	
		Per Termination )		
				NRCLF

\* The signal grade rate applies only to signal grade lines as defined in Section 16 of this Tariff.

\*\* In addition, feature function rate elements (Para. D.3.f.) apply to all "other than signal grade" Central Office and Block Loops.

# When connected to an interconnector's multiplexing node under Section 12, a Universal Service Element Charge and a Service Access Charge will apply as specified in Section 12, Paragraph 1.2. (C)  
(C)

Effective, \_\_\_\_\_, under authority of the Public Service Commission, State of New York, Special Permission Order No. T&T \_\_\_\_\_, dated \_\_\_\_\_, Issued December 26, 1991. Effective January 31, 1992

By Cornelia McDougald, General Attorney  
1095 Avenue of the Americas, New York, N.Y. 10036

New York Telephone Company

Section 1  
 4th Revised Page 24  
 Superseding 3rd Revised Page 24

MILEAGED. MILEAGE ON LINES BETWEEN LOCATIONS (Cont'd)4. Lines (other than Intercept) Between Two Points

	<u>Intrabuilding Channel Charges</u>	<u>Central Office Loops</u>
a. Mileage Components		
★ [ Between Points in the Same Building, between different floors		
Extensions on Individual and Centrex lines	1	0
Bridged Station lines on Individual, PBX and Centrex station lines	1	0
Tie Lines Between Centrex Services	0	0
Between CTX and PBX	0	1
Between PBX Services	2	0
All Other Lines and Channels, including Access Channels Per Termination	1	0

NOTE: A. Intrabuilding Channels will be provided only where existing spare capacity exists. The Company will not undertake to construct new facilities for the provision of channel service wholly within a single building.

(D)

Issued November 15, 1991.

Effective January 31, 1992.

By Cornelia McDougald, General Attorney  
 1095 Avenue of the Americas New York, N.Y. 10036

New York Telephone Company

Section 7  
4th Revised Page 68  
Superseding 1st and 3rd Revised Pages 68  
(2nd Revised Page 68 Cancelled)

MILEAGE

F. FLEXIBLE PRICING

(T)

Only the following mileage services are included:

Components:	La Guardia Airport Lines
Continuous Property Loop	World Trade Center Lines
	(C)
<u>Intrabuilding Channel Charge</u>	(C)

1. Mileage service rates may be reduced selectively and in varying amounts, so long as rates cover their relevant incremental costs.
2. Mileage service rates may be increased selectively and in varying amounts not to exceed 25 percent per year. Exception, intrabuilding channel charge rates may be increased selectively and in varying amounts not to exceed 5 percent per year. (C)
3. The Company reserves the right to change the rates as described in 1. and 2. preceding at any time upon 10 days notice to the Public Service Commission by providing a revised Rate Schedule and appropriate cost support. The rates for this service are shown in the Rate Schedule appended as Page 3 of the Attachment to this Section 7. (C)
4. Changes in mileage service rates will be effective coincident with the subscriber's bill date following the effective date of the change.
5. A rate will not be changed unless it has been in effect for at least 30 days.
6. Appropriate customer notification of mileage service rate changes will be made.
7. Mileage service rates may be changed in accordance with the provisions of 1. through 6. preceding in the New York Metropolitan LATA (C)

(D)

Effective, \_\_\_\_\_, under authority of the Public Service Commission,  
State of New York, Special Permission Order No. T&T \_\_\_\_\_, dated \_\_\_\_\_,  
Issued December 26, 1991. Effective January 31, 1992.  
By Cornelia McDougald, General Attorney  
1095 Avenue of the Americas, New York, N.Y. 10036

RATE SCHEDULE

NON-NEW YORK METRO LATA

(T)

Mileage  
(Rates effective January 10, 1992)

Mileage Components	<u>Monthly Rates</u>		<u>USOC</u>
	<u>Signal Grade*</u>	<u>Other Than Signal Grade</u>	
Continuous Property Loop			
Per 2-Wire Loop	\$ 3.85	\$ 3.85	CPL2X
Per 4-Wire Loop	7.70	7.70	CPL4X
★ [ Intrabuilding Channel Charge			
Per 2-Wire Termination	2.89	2.89	93G59
Per 4-Wire Termination	5.77	5.77	93G50

\* The signal grade rate applies only to signal grade lines as defined in  
P.S.C. No. 900 - Telephone, Section 16.

This Attachment to be filed following all pages that are a part of this section.

RATE SCHEDULE

NEW YORK METRO LATA

Mileage  
(Rates effective July 28, 1993)

Mileage Components	<u>Monthly Rates</u>		<u>USOC</u>
	<u>Signal Grade*</u>	<u>Other Than Signal Grade</u>	
Continuous Property Loop			
Per 2-Wire Loop	\$ 4.81	\$ 4.81	
Per 4-Wire Loop	9.63	9.63	(C)
★ [ Intrabuilding Channel Charge			
Per 2-Wire Termination	3.03	3.03	
Per 4-Wire Termination	6.06	6.06	

\* The signal grade rate applies only to signal grade lines as defined in  
P.S.C. No. 900 - Telephone, Section 16.

This Attachment to be filed following all pages that are a part of this section